

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

YEHUDA HERSKOVIC,

*Plaintiff,*

*-against-*

VERIZON WIRELESS,

*Defendant.*

Case No.: 1:2019cv03372

**SUPPLEMENTAL  
DECLARATION OF DANIEL  
REED RE MOTION TO  
COMPEL CONTRACTUAL  
ARBITRATION AND STAY  
ACTION**

Case Removed: June 6, 2019

**SUPPLEMENTAL DECLARATION OF DANIEL REED IN SUPPORT OF MOTION TO  
COMPEL CONTRACTUAL ARBITRATION AND STAY ACTION**

I, Daniel Reed, hereby declare as follows:

1. I am over the age of 18 and am competent to testify to the facts declared below, and could testify truthfully thereto if required. I am currently employed by Verizon Wireless as a Senior Analyst. I have been employed by Verizon Wireless since 2005. In my capacity as a Senior Analyst, I provide services to Celco Partnership d/b/a Verizon Wireless ("Verizon Wireless"). Specifically, I assist with the handling of consumer disputes for Verizon Wireless, among other things.

2. In preparing this Supplemental Declaration, I have relied on my personal knowledge of, and experience in, the business operations of Verizon Wireless as well as a review of Verizon Wireless's business records. Verizon Wireless's business records are made in the regular course of business, at or near the time of the act, conditions or events described in the documents, and by or from information provided by a person with knowledge of the act,

conditions or event. The attached Exhibits 1 and 2 are true and correct copies of Verizon Wireless's business records.

3. I offer this Supplemental Declaration to address the request made by the Court at the initial status conference on September 10, 2019 for the sales receipt and customer agreement that Plaintiff Yehuda Herskovic ("Plaintiff") executed at 100 Wall Street, New York, NY for his phone number ending in 4565.

4. On December 8, 2016, at a third-party Verizon Wireless retail store located at 100 Wall Street, New York, NY, Plaintiff executed a sales receipt for equipment and services in connection with phone numbers ending in 4565 and 6897. Attached hereto as **Exhibit A** is a true and correct copy of this sales receipt executed by Plaintiff on December 8, 2016.

5. Attached hereto as **Exhibit B** is a true and correct copy of the Verizon Wireless Customer Agreement in effect on December 8, 2016 when Exhibit A was executed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on September 27, 2019 at Irvine, California.

A handwritten signature in dark ink, appearing to read 'Daniel Reed', written over a horizontal line.

Daniel Reed